



Genova Burns LLC  
494 Broad Street, Newark, NJ 07102  
Tel: 973.533.0777 Fax: 973.814.4045  
Web: [www.genovaburns.com](http://www.genovaburns.com)  
Affiliated with Genova Burns LLP

Rajiv D. Parikh, Esq.  
Partner  
Member of NJ and NY Bars  
[rparikh@genovaburns.com](mailto:rparikh@genovaburns.com)  
Direct: 973-535-4446

March 6, 2024

**VIA ELECTRONIC FILING**

Hon. Zahid N. Quraishi, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building  
402 East State Street  
Trenton, New Jersey 08608

**Re: Kim, et al. v. Hanlon, et al.,  
Civil Action No.: 24-1098(ZNQ)(TJB)**

Dear Judge Quraishi:

Kindly accept this letter brief in lieu of a more formal application pursuant to L. Civ. R. 7.2 to request leave to file an overlength brief on behalf of defendants Danielle Ireland-Imhof, Christopher Durkin and Joanne Rajoppi (the "County Clerks"). As the Court is aware, this matter involves a voluminous submission by Plaintiffs of complex election related matters. In addition, as set forth in my letter from earlier today, the County Clerks filed a Cross-Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(7). *See* Docket Entry No. 63-1.

In light of the opposition and cross-motion, the County Clerk's respectfully request leave for a one (1) page extension of the page limitation for acceptance of their brief that is forty-one (41) pages in length, with a signature block that extends to the forty-second (42) page. *See* Docket Entry No. 63. Based on the circumstances here, we respectfully submit that the County Clerks have satisfied the standard for such relief under L. Civ. R. 7.2. Should the Court require more formal briefing on this issue, we would be happy to submit same.

Respectfully,

**GENOVA BURNS LLC**

s/ Rajiv D. Parikh

RAJIV D. PARIKH

c: Counsel of Record (via ECF)